



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 19, 2021

BY ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)*

Dear Judge Nathan:

The Government writes with respect to the Court's Order dated April 19, 2021, which directed the Government to notify the Court by tomorrow whether it intends to "use any of the documents subject to the pending motions to suppress in the trial of the non-perjury counts in this case." (Dkt. No. 216). The Government respectfully requests that the Court grant the Government until Thursday, April 22, 2021, to submit its response.

The Government is carefully considering the Court's Order, and has begun reviewing its file, considering legal issues, and having internal conversations with supervisors in order to thoughtfully and accurately respond to the Court. In particular, although the materials at issue are not likely to be central to the Government's case in chief in the trial of the non-perjury counts, the Government nonetheless recognizes the importance of anticipating how these materials may be relevant to (and used at) the trial. For example, and among other considerations, the materials include transcripts of depositions of witnesses who may testify at trial, and the Government is mindful of potential uses of such material that might arise during the cross-examination of both Government and defense witnesses whose prior statements are encompassed within the materials at issue.

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The Government appreciates the need to resolve this scheduling matter quickly. However, with the goal of being able to most accurately address the Court's question, the Government respectfully requests that the Court grant the Government until Thursday, April 22, 2021 to submit its response.

Respectfully submitted,

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United States Attorney

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Cc: All Counsel of Record (By ECF)